1:22-cv-07505-BMC 2// Broadway, Suite 1501 Page 1 of 1 Page D#: 398 aw.com* Gideon Orion Oliver —ATTORNEY AT LAW— He/him/his

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April 17, 2023

BY ECF

Hon. Brian M. Cogan United States District Judge United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

> *Justin Sherwood v. City of New York, et al.*, 22-cv-7505 (BMC) Re:

Your Honor:

I am co-counsel for Plaintiff Justin Sherwood. On April 6, 2023, Defendant NYPD Detective Samantha Sturman moved to dismiss pursuant to Fed.R.Civ.P. 12(b)(6). Plaintiff's opposition is currently due on April 20, 2023. I write with Defendants' consent seeking leave to file Plaintiff's opposition on May 11, 2023 instead, with Defendant Sturman's reply due on May 18, 2023. Plaintiff seeks this adjustment because the motion came during the Passover holiday and a time that is very busy for counsel, with significant pre-trial filings due at the end of this week, among other deadlines. Additionally, I understand that other Defendants also plan to file a motion to dismiss shortly, and, if the Court grants the requested extension, it may be possible for Plaintiff to address both motions in a single submission. No party has previously asked the Court to adjourn these deadlines. If the Court grants this application, it will not impact any other deadlines in the case.

Thank you for your attention to this matter.

Respectfully submitted,

/S/

Gideon Orion Oliver